

Permit Exemptions

Update

10 TPY exemptions - NSR

- Present Plan
 - Make available **only** to facilities with a current facility-wide operation permit
 - Reg. construction permits also available for non-Part 70 facilities

NSR exemptions

- Process exemptions as minor revisions
 - If a project is not a minor revision, then this exemption may not be available
 - Exemption needs to meet minor revision gatekeepers
 - Key gatekeepers:
 - Does not violate any applicable requirement
 - Does not establish source-specific limits (i.e. modeling based emission limits, LACT)

NSR Exemptions

- Minor revision advantages/solutions
 - Can start operation immediately
 - Requirements are immediately enforceable (no issues with not being able to enforce recordkeeping and other restrictions)
 - Include LACT (NR 424) language in exemption so NR 406 creates these requirements
 - Include 2.3 lb/hour PM limit so NR 406 creates this limitation

NSR Exemptions

- Other issues/caveats
 - Cannot be subject to NR 405, NR 408, MACT, NSPS permitting
 - Facility must request exemption and permit revision prior to undertaking the project
 - 10 TPY exemption based on project (all affected units) actual emissions and not per unit exemption

Operation Permit exemptions

- Available for facility with less than 10 TPY actual emissions
- Exempt from operation permits and construction permits
- Need a permit (type to be determined based on change) in order to exceed 10 TPY
- Submit request to claim this exemption
- Recordkeeping/enforceability

Permit exemption

- Exemption claim
 - Letter/form/AEI report to Department claiming
 - Agree to keep appropriate records (I.e. fuel usage/capacity, coating usage, control equipment operation parameters,...)

LACT exemption from NSR

- Language not drafted
 - Propose to exempt from NSR changes to LACT which do not increase potential VOC emissions
 - Will likely require significant operation permit revision

Clean fuel exemption

- Allow switching/incorporation of a clean fuel (natural gas/propane/low-sulfur #2 oil) without obtaining a construction permit
- Likely to be significant operation permit revision
- Size cut-off for boilers proposed as 10MMBTU/hr for change of #2 oil and 25 MMBTU/hr for change of nat. gas/propane